



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

APR 18 1996

REPLY TO THE ATTENTION OF:

WU-17J

Ms. Mona Nemecek
Indiana Department of Natural Resources
402 West Washington Street, Room W293
Indianapolis, Indiana 46204

Subject: Request for an Exemption of the Trenton Aquifer in the Vicinity of Chalmers, Indiana, from the Protections of the Safe Drinking Water Act

Dear Ms. Nemecek:

Our review of the request to exempt the Trenton Formation surrounding the proposed injection well at 8' FSL and 38' FWL of the NW SW NW of Section 25, T26N-R4W in White County (Indiana permit #43938) indicates that the request is incomplete. The criteria for exempting underground sources of drinking water (USDWs) are specified at 40 CFR 146.4. Although Mike Nickolaus' letter of June 14, 1994, states that the aquifer is hydrocarbon producing and is situated at a depth or location which makes recovery of water for drinking water purposes economically or technologically impracticable, there is no information submitted to support these statements. The letter also states, as a justification to exempt the aquifer, that the TDS content of the fluid in the proposed injection formation is greater than 3,000 mg/l. By itself, this is not a justification; an aquifer can be exempted if the TDS is less than 10,000 mg/l. only if the TDS is greater than 3,000 mg/l. and if the aquifer is not reasonably expected to supply a public water supply system.

Although an aquifer which cannot supply a public water system due to low sustained flow capacity could be exempted. We believe that any well which is suitable for injection will probably exceed the standard which is defined at 40 CFR 142.2(k) as, essentially 2.1 gallons per minute. If the applicant, Indiana Gas Company, should choose the option of determining the yield capacity of the aquifer they must contact and schedule with our USEPA field inspector to witness the aquifer yield capacity test.

The most environmentally benign alternative to injection into the Trenton Formation is injection into a deeper formation which is not a USDW. There should be such aquifers above and including the Mt. Simon Sandstone, which has a TDS concentration of 110,000 mg/l.

The operator must supply information which will support the claim that the aquifer cannot reasonably be expected to supply a public drinking water system, or that the Trenton has produced or is capable of producing hydrocarbons at the site of the proposed injection well.

If you have any questions concerning this letter, please call me at (312) 886-2939.

Sincerely yours,

A handwritten signature in dark ink, appearing to read "Harlan Gerrish". The signature is fluid and cursive, with the first name "Harlan" being more prominent than the last name "Gerrish".

Harlan Gerrish, Geologist
Underground Injection control Branch